

Presentment Date and Time: February 6, 2017 at 4:00 p.m.

Objection Deadline: February 3, 2017 at 4:00 p.m.

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*Counsel to the Debtors
and Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re : Chapter 11
:
Gawker Media LLC, *et al.*,¹ : Case No. 16-11700 (SMB)
:
Debtors. : (Jointly Administered)
:
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**NOTICE OF PRESENTMENT OF STIPULATION AND ORDER BETWEEN THE
DEBTORS AND TRAVELERS REGARDING THE STAY RELIEF MOTION**

PLEASE TAKE NOTICE that on September 2, 2016, St. Paul Fire & Marine Insurance Company (“Travelers”) filed the *Motion for Relief from the Automatic Stay Pursuant to 11 U.S.C. § 362(d)* [Docket No. 243] (the “Stay Relief Motion”);

PLEASE TAKE FURTHER NOTICE that on September 30, 2016, the Debtors filed the *Debtors’ Objection to Motion for Relief from the Automatic Stay by St. Paul Fire and Marine Insurance Company* [Docket No. 307];

¹ The last four digits of the taxpayer identification number of the debtors are: Gawker Media LLC (0492); Gawker Media Group, Inc. (3231); and Gawker Hungary Kft. (f/k/a Kinja Kft.) (5056). Gawker Media LLC and Gawker Media Group, Inc.’s mailing addresses are c/o Opportune LLP, Attn: William D. Holden, Chief Restructuring Officer, 10 East 53rd Street, 33rd Floor, New York, NY 10022. Gawker Hungary Kft.’s mailing address is c/o Opportune LLP, Attn: William D. Holden, 10 East 53rd Street, 33rd Floor, New York, NY 10022.

PLEASE TAKE FURTHER NOTICE that on October 5, 2016, Travelers filed the *Reply Brief in Support in Further Support of the Motion for Relief from the Automatic Stay Pursuant to 11 U.S.C. § 362(d)* [Docket No. 319];

PLEASE TAKE FURTHER NOTICE that on October 6, 2016, the Court held a hearing on the Stay Relief Motion, at which time it reserved its decision;

PLEASE TAKE FURTHER NOTICE that, following good-faith, arm's-length negotiations between the Debtors and Travelers, the parties have consensually resolved the dispute relating to the Stay Relief Motion, as set forth on the stipulation and order attached hereto as **Exhibit A** hereto (the "Stipulation and Order");

PLEASE TAKE FURTHER NOTICE that, absent objections, the undersigned will present the Stipulation and Order for signature to the Court on **February 6, 2017 at 4:00 p.m.**; and

PLEASE TAKE FURTHER NOTICE that responses or objections to the Stipulation and Order, if any, shall be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the Southern District of New York, shall set forth the basis for the response or objection and the specific grounds therefore, and shall be filed with the Court electronically in accordance with General Order M-399 by registered users of the Court's case filing system (the User's Manual for the Electronic Case Filing System can be found at <http://www.nysb.uscourts.gov>, the official website for the Court), with a hard copy delivered directly to chambers and served so as to be actually received no later than **February 3, 2017 at 4:00 p.m.** (prevailing Eastern Time) (the "Objection Deadline"), upon (i) the Debtors, Attn. William D. Holden (profinvoices@gawker.com); (ii) counsel for the Debtors, Ropes & Gray LLP, 1211 Avenue of the Americas, New York, NY 10036, Attn: Gregg M. Galardi

(gregg.galardi@ropesgray.com); (iii) the Office of the United States Trustee for the Southern District of New York, 201 Varick Street, Suite 1006, New York, NY 10014, Attn: Greg Zipes & Susan Arbeit; (iv) the Internal Revenue Service; (v) the United States Attorney for the Southern District of New York; (vi) counsel to the Official Committee of Unsecured Creditors, Simpson Thacher & Bartlett, 425 Lexington Avenue, New York, NY 10017, Attn: Sandy Qusba (squsba@stblaw.com) and William T. Russell (wrussell@stblaw.com); (vii) counsel to US VC Partners LP, Latham & Watkins LLP, 330 North Wabash Avenue, Suite 2800, Chicago, IL 60611, Attn: David Heller (david.heller@lw.com) & Keith A. Simon, 885 Third Avenue, New York, New York 10022, Attn: Keith A. Simon (keith.simon@lw.com); (viii) counsel to Cerberus Business Finance, LLC, Schulte Roth & Zabel LLP, 919 Third Avenue, New York, New York 10022, Attn: Adam C. Harris (adam.harris@srz.com); (ix) counsel for Travelers, Putney, Twombly, Hall & Hirson LLP, 521 Fifth Avenue, New York, New York 10175, Attn: Thomas A. Martin; and (x) those persons who have formally appeared and requested service in these cases pursuant to Bankruptcy Rule 2002.

Dated: January 24, 2017
New York, New York

/s/ Gregg M. Galardi
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